

EXHIBIT A

The REKK User Defendants' Role in the Scheme

1. **Andrew Ling:** On April 22, 2023, Andrew Ling placed an Amazon order for five Apple iPads causing the products to be shipped via Amazon Logistics. The products were delivered to Andrew Ling's address of record on April 22 and 23, 2023. Andrew Ling paid Amazon \$2,172.05 via an interstate electronic financial transaction for the products. Subsequently, Andrew Ling engaged REKK to receive a fraudulent refund of the products. On April 22, 2023, an Amazon fulfillment center associate was the victim of an insider phishing attack orchestrated upon information and belief by REKK, in which REKK falsely claimed to be "Amazon HR" and coerced the associate to provide their account login credentials. As a result, their Amazon account was used to approve all five of Andrew Ling's orders as returned, despite none of the products being returned to Amazon. As a result, on April 29, 2023, Amazon was fraudulently induced to refund Andrew Ling \$2,172.05 via interstate electronic financial transaction. Andrew Ling retained the products and the refund. Upon information and belief, Andrew Ling paid the REKK Operator Defendants a percentage of the fraudulently obtained refund and sent them a vouch, which was posted to the Telegram channel, as evidence of the successful refund.

2. **Brandon Sukhram:** On May 3, 2023, Brandon Sukhram placed an Amazon order for two high-value gaming electronics, causing the products to be shipped via Amazon Logistics. The products were delivered to Brandon Sukhram's address of record on May 8, 2023. Brandon Sukhram paid Amazon €1,047.80 Euro via international electronic financial transaction for the products. Subsequently, Brandon Sukhram engaged REKK to receive a fraudulent refund of the products. On May 9, 2023, Brandon Sukhram, or REKK acting on behalf of Brandon Sukhram, contacted Amazon Customer Service stating that he received empty packages in place of the products ordered. As a result, on May 10, 2023, Amazon was fraudulently induced to partially refund Brandon Sukhram €309.90 Euro via international electronic financial transaction. Brandon Sukhram retained the products and the refund. Upon information and belief, Brandon Sukhram paid the REKK Operator Defendants a percentage of

1 the fraudulently obtained refund and sent them a vouch, which was posted to the Telegram
2 channel, as evidence of the successful refund.

3 **3. Charalampos Gkatzoulas:** On September 3, 2022, Charalampos Gkatzoulas
4 placed an Amazon order for three Galaxy cell phones, causing the products to be shipped via
5 DHL. The products were delivered to Charalampos Gkatzoulas' address of record on October 7,
6 2022. Charalampos Gkatzoulas paid Amazon €3,641.17 Euro via international electronic
7 financial transaction for the products. Subsequently, Charalampos Gkatzoulas engaged REKK to
8 receive a fraudulent refund of the products. On April 22, 2023, an Amazon fulfillment center
9 associate was the victim of an insider phishing attack orchestrated, upon information and belief,
10 by REKK, in which REKK falsely claimed to be "Amazon HR" and coerced the associate to
11 provide their account login credentials. As a result, on May 4, 2023, Amazon was fraudulently
12 induced to refund Charalampos Gkatzoulas €3,641.17 Euro via international electronic financial
13 transaction. Charalampos Gkatzoulas retained the products and the refund. Upon information
14 and belief, Charalampos Gkatzoulas paid the REKK Operator Defendants a percentage of the
15 fraudulently obtained refund and sent them a vouch, which was posted to the Telegram channel,
16 as evidence of the successful refund.

17 **4. Cosmin Sopca:** On June 1, 2022, Cosmin Sopca placed an Amazon order for one
18 motherboard fan, one electronic toothbrush, and one compressed air duster, causing the products
19 to be shipped via UPS. The products were delivered to Cosmin Sopca's address of record on
20 June 8, 2022. Cosmin Sopca paid Amazon 846.41 GBP via international electronic financial
21 transaction for the products. Subsequently, Cosmin Sopca engaged REKK to receive a
22 fraudulent refund of the products. On June 5, 2022, REKK manipulated the shipping data of the
23 products, fraudulently inducing Amazon to refund Cosmin Sopca 846.41 GBP via international
24 electronic financial transaction. Cosmin Sopca retained the products and the refund. Upon
25 information and belief, Cosmin Sopca paid the REKK Operator Defendants a percentage of the
26 fraudulently obtained refund and sent them a vouch, which was posted to the Telegram channel,
27 as evidence of the successful refund.

1 **5. Dylan Hinz:** On April 24, 2023, Dylan Hinz placed an Amazon order for three
2 Apple 2023 MacBook Pro laptops, causing the products to be shipped via UPS. The products
3 were delivered to Dylan Hinz's address of record on April 28, 2023. Dylan Hinz paid Amazon
4 \$6,754.30 via interstate electronic financial transaction for the products. Subsequently, Dylan
5 Hinz engaged REKK to receive a fraudulent refund of the products. Earlier that week, an
6 Amazon fulfillment center associate was the victim of an insider phishing attack orchestrated,
7 upon information and belief, by REKK, in which REKK falsely claimed to be "Amazon HR"
8 and coerced the associate to provide their account login credentials. As a result, on April 29,
9 2023, Amazon was fraudulently induced to refund Dylan Hinz \$6,754.30 via interstate electronic
10 financial transaction. Dylan Hinz retained the products and the refund. Upon information and
11 belief, Dylan Hinz paid the REKK Operator Defendants a percentage of the fraudulently
12 obtained refund and sent them a vouch, which was posted to the Telegram channel, as evidence
13 of the successful refund.

14 **6. Eric Niezabytowski:** On April 29, 2023, Eric Niezabytowski placed an Amazon
15 order for a car tire, two Garmin speakers, and a car exhaust, causing the products to be shipped
16 via UPS and Amazon Logistics. The products were delivered to Eric Niezabytowski's address of
17 record on May 1, 4, and 9, 2023. Eric Niezabytowski paid Amazon \$2,117.84 via interstate
18 electronic financial transaction for the products. Subsequently, Eric Niezabytowski engaged
19 REKK to receive a fraudulent refund of the products. On May 5, 2023, an Amazon fulfillment
20 center associate was the victim of an insider phishing attack orchestrated, upon information and
21 belief, by REKK, in which REKK falsely claimed to be "Amazon Investigation" and coerced the
22 associate to provide their account login credentials. As a result, on May 6, 2023, Amazon was
23 fraudulently induced to refund Eric Niezabytowski \$1,693.86 via interstate electronic financial
24 transaction. Eric Niezabytowski retained the products and the refund. Upon information and
25 belief, Eric Niezabytowski paid the REKK Operator Defendants a percentage of the fraudulently
26 obtained refund and sent them a vouch, which was posted to the Telegram channel, as evidence
27 of the successful refund.

1 7. **Graham Ferguson:** On April 27, 2023, Graham Ferguson placed an Amazon
2 order for two MacBook laptops, causing the products to be shipped via UPS and USPS. The
3 products were delivered to Graham Ferguson's address of record on May 1 and 3, 2023. Graham
4 Ferguson paid Amazon \$5,216.36 via interstate electronic financial transaction for the products.
5 Subsequently, Graham Ferguson engaged REKK to receive a fraudulent refund of the products.
6 On May 7, 8, and 9, 2023, an Amazon insider fraudulently approved Graham Ferguson's refund,
7 despite the products never being returned. As a result, on May 7, 8, and 9, 2023, Amazon was
8 fraudulently induced to refund Graham Ferguson a total of \$5,216.36 via interstate electronic
9 financial transaction. Graham Ferguson retained the products and the refund. Upon information
10 and belief, Graham Ferguson paid the REKK Operator Defendants a percentage of the
11 fraudulently obtained refund and sent them a vouch, which was posted to the Telegram channel,
12 as evidence of the successful refund.

13 8. **Ivona Brazovskaja:** On April 28, 2023, Ivona Brazovskaja placed an Amazon
14 order for two Apple iPhone 14 Pros, causing the products to be shipped via Amazon Logistics.
15 The products were delivered to Ivona Brazovskaja's address of record on May 3, 2023. Ivona
16 Brazovskaja paid Amazon €2,653.98 Euro via international electronic financial transaction for
17 the products. Subsequently, Ivona Brazovskaja engaged REKK to receive a fraudulent refund of
18 the products. On May 8, 2023, Amazon received a falsified police report from Ivona
19 Brazovskaja after claiming the products were not received. As a result, Amazon was
20 fraudulently induced to refund Ivona Brazovskaja €2,653.98 Euro via international electronic
21 financial transaction. Ivona Brazovskaja retained the products and the refund. Upon information
22 and belief, Ivona Brazovskaja paid the REKK Operator Defendants a percentage of the
23 fraudulently obtained refund and sent them a vouch, which was posted to the Telegram channel,
24 as evidence of the successful refund.

25 9. **James Garofalo:** On April 2, 2023, James Garofalo placed an Amazon order for
26 a gaming motherboard, causing the product to be shipped via Amazon Logistics. The product
27 was delivered to James Garofalo's address of record on April 30, 2023. James Garofalo paid

1 Amazon \$913.75 via interstate electronic financial transaction for the product. Subsequently,
2 James Garofalo engaged REKK to receive a fraudulent refund of the product. On May 2, 2023,
3 an Amazon insider fraudulently approved James Garofalo's refund, despite the product never
4 being returned. As a result, on May 6, 2023, Amazon was fraudulently induced to refund James
5 Garofalo \$913.75 via interstate electronic financial transaction. James Garofalo retained the
6 product and the refund. Upon information and belief, James Garofalo paid the REKK Operator
7 Defendants a percentage of the fraudulently obtained refund and sent them a vouch, which was
8 posted to the Telegram channel, as evidence of the successful refund.

9 10. **Jenny Tran:** On April 19, 2023, Jenny Tran placed an Amazon order for two
10 Apple MacBook Air laptops, causing the products to be shipped via Amazon Logistics. The
11 products were delivered to Jenny Tran's address of record on April 20, 2023. Jenny Tran paid
12 Amazon 2,198 GBP via international electronic financial transaction for the product.
13 Subsequently, Jenny Tran engaged REKK to receive a fraudulent refund of the products. On
14 May 8, 2023, Amazon received a falsified police report from Jenny Tran after Jenny Tran, or
15 REKK acting on behalf of Jenny Tran, claimed they had received an empty box. As a result,
16 Amazon was fraudulently induced to refund Jenny Tran 2,198 GBP via international electronic
17 financial transaction. Jenny Tran retained the products and the refund. Upon information and
18 belief, Jenny Tran paid the REKK Operator Defendants a percentage of the fraudulently obtained
19 refund and sent them a vouch, which was posted to the Telegram channel, as evidence of the
20 successful refund.

21 11. **Johanes Kessel:** On May 19, 2022, Johanes Kessel placed an Amazon order for
22 one gaming motherboard and one virtual reality charging dock, causing the products to be
23 shipped via UPS. The products were delivered to Johanes Kessel's address of record on May 27,
24 2022. Johanes Kessel paid Amazon \$2,309.37 via interstate electronic financial transaction for
25 the products. Subsequently, Johanes Kessel engaged REKK to receive a fraudulent refund of the
26 products. On May 21, 2022, REKK manipulated the shipping data of the products, fraudulently
27 inducing Amazon to refund Johanes Kessel \$2,309.37 via interstate electronic financial

1 transaction. Johanes Kessel retained the products and the refund. Upon information and belief,
2 Johanes Kessel paid the REKK Operator Defendants a percentage of the fraudulently obtained
3 refund and sent them a vouch, which was posted to the Telegram channel, as evidence of the
4 successful refund.

5 12. **Jorge Correa:** On April 29, 2023, Jorge Correa placed an Amazon order for a
6 PlayStation 5 Console, causing the product to be shipped via USPS. The product was delivered
7 to Jorge Correa's address of record on May 1, 2023. Jorge Correa paid Amazon \$528.94 via
8 interstate electronic financial transaction for the product. Subsequently, Jorge Correa engaged
9 REKK to receive a fraudulent refund of the product. On May 5, 2023, an Amazon fulfillment
10 center associate was the victim of an insider phishing attack orchestrated, upon information and
11 belief, by REKK, in which REKK falsely claimed to be "Amazon Investigation" and coerced the
12 associate to provide their account login credentials. As a result, on May 6, 2023, Amazon was
13 fraudulently induced to refund Jorge Correa \$528.94 via interstate electronic financial
14 transaction. Jorge Correa retained the product and the refund. Upon information and belief,
15 Jorge Correa paid the REKK Operator Defendants a percentage of the fraudulently obtained
16 refund and sent them a vouch, which was posted to the Telegram channel, as evidence of the
17 successful refund.

18 13. **Josh Davis:** On April 12, 2023, Josh Davis placed an Amazon order for an Apple
19 iPad Pro, causing the product to be shipped via Amazon Logistics. The product was delivered to
20 Josh Davis's address of record on April 14, 2023. Josh Davis paid Amazon \$1,308.77 via
21 interstate electronic financial transaction for the products. Subsequently, Josh Davis engaged
22 REKK to receive a fraudulent refund of the product. On April 28, 2023, REKK contacted an
23 Amazon fulfillment center employee posing as Amazon HR personnel and instructed an insider
24 to fraudulently approve Josh Davis's refund, despite the product never being returned. As a
25 result, that same day Amazon was fraudulently induced to refund Josh Davis \$1,308.77 via
26 interstate electronic financial transaction. Josh Davis retained the products and the refund. Upon
27 information and belief, Josh Davis paid the REKK Operator Defendants a percentage of the

1 fraudulently obtained refund and sent them a vouch, which was posted to the Telegram channel,
2 as evidence of the successful refund.

3 14. **Karcper Niepogoda:** On December 11, 2022, Karcper Niepogoda placed an
4 Amazon order for a computer power supply unit and a computer gaming memory device,
5 causing the products to be shipped via DHL and Amazon Logistics. The products were delivered
6 to Karcper Niepogoda's address of record on December 13, 2022. Karcper Niepogoda paid
7 Amazon €582.50 Euro via international electronic financial transaction for the products.
8 Subsequently, Karcper Niepogoda engaged REKK to receive a fraudulent refund of the products.
9 On May 2, 2023, REKK compromised an external Amazon tool used by sellers to process
10 inventory, fraudulently inducing Amazon to refund Karcper Niepogoda €574.50 Euro via
11 international electronic financial transaction despite the products never being returned. Karcper
12 Niepogoda retained the products and the refund. Upon information and belief, Karcper
13 Niepogoda paid the REKK Operator Defendants a percentage of the fraudulently obtained refund
14 and sent them a vouch, which was posted to the Telegram channel, as evidence of the successful
15 refund.

16 15. **Olaf Booij:** On January 25, 2023, Olaf Booij placed an Amazon order for two
17 Samsung Galaxies and an Apple iPad, causing the products to be shipped via DHL. The
18 products were delivered to Olaf Booij's address of record on January 26, 2023. Olaf Booij paid
19 Amazon €2,116.02 Euro via international electronic financial transaction for the products.
20 Subsequently, Olaf Booij engaged REKK to receive a fraudulent refund of the products. On
21 May 2, 2023, REKK compromised an external Amazon tool used by sellers to process inventory,
22 fraudulently inducing Amazon to refund Olaf Booij €1,454.91 Euro via international electronic
23 financial transaction despite the products never being returned. Olaf Booij retained the products
24 and the refund. Upon information and belief, Olaf Booij paid the REKK Operator Defendants a
25 percentage of the fraudulently obtained refund and sent them a vouch, which was posted to the
26 Telegram channel, as evidence of the successful refund.

1 **16. Ryan Bates:** On April 11, 2023, Ryan Bates placed an Amazon order for a
 2 gaming monitor and a gaming PC, causing the products to be shipped via Amazon Logistics.
 3 The products were delivered to Ryan Bates's address of record on April 13, 2023. Ryan Bates
 4 paid Amazon 7,520.99 CDN via international electronic financial transaction for the product.
 5 Subsequently, Ryan Bates engaged REKK to receive a fraudulent refund of the products. On
 6 April 21, 2023, Amazon received a falsified police report from Ryan Bates after Ryan Bates or
 7 REKK acting on behalf of Ryan Bates, claimed they had received an empty box. As a result,
 8 Amazon was fraudulently induced to refund Ryan Bates 7,520.99 CDN via international
 9 electronic financial transaction. Ryan Bates retained the products and the refund. Upon
 10 information and belief, Ryan Bates paid the REKK Operator Defendants a percentage of the
 11 fraudulently obtained refund and sent them a vouch, which was posted to the Telegram channel,
 12 as evidence of the successful refund.

13 **17. Sai Charan Beeravelli:** On April 30, 2023, Sai Charan Beeravelli placed an
 14 Amazon order for a 1 oz 24K gold coin, causing the product to be shipped via Amazon Logistics.
 15 The product was delivered to Sai Charan Beeravelli's address of record on May 2, 2023. Sai
 16 Charan Beeravelli paid Amazon \$2,682.30 via interstate electronic financial transaction for the
 17 product. Subsequently, Sai Charan Beeravelli engaged REKK to receive a fraudulent refund of
 18 the products. On May 5, 2023, an Amazon fulfillment center associate was the victim of an
 19 insider phishing attack orchestrated, upon information and belief, by REKK, in which REKK
 20 falsely claimed to be "Amazon Investigation" and coerced the associate to provide their account
 21 login credentials. As a result, that same day Amazon was fraudulently induced to refund Sai
 22 Charan Beeravelli \$2,682.30 via interstate electronic financial transaction. Sai Charan Beeravelli
 23 retained the product and the refund. Upon information and belief, Sai Charan Beeravelli paid the
 24 REKK Operator Defendants a percentage of the fraudulently obtained refund and sent them a
 25 vouch, which was posted to the Telegram channel, as evidence of the successful refund.

26 **18. Simone Antonio Figura:** On May 1, 2023, Simone Antonio Figura placed an
 27 Amazon order for three Apple iPhone Pros and a robot vacuum, causing the products to be

1 shipped via Amazon Logistics and SDA Express. The products were delivered to Simone
2 Antonio Figura's address of record on May 5 and 8, 2023. Simone Antonio Figura paid Amazon
3 €5,103.99 Euro via international electronic financial transaction for the product. Subsequently,
4 Simone Antonio Figura engaged REKK to receive a fraudulent refund of the products. On
5 May 9, 2023, Amazon received a falsified police report from Simone Antonio Figura after
6 claiming the products were not received. As a result, Amazon was fraudulently induced to
7 refund Simone Antonio Figura €5,103.99 Euro via international electronic financial transaction.
8 Simone Antonio Figura retained the products and the refund. Upon information and belief,
9 Simone Antonio Figura paid the REKK Operator Defendants a percentage of the fraudulently
10 obtained refund and sent them a vouch, which was posted to the Telegram channel, as evidence
11 of the successful refund.

12 19. **Zachary Iguelmamene:** On June 14, 2022, Zachary Iguelmamene placed an
13 Amazon order for a gaming storage card and gaming monitor, causing the products to be shipped
14 via Amazon Logistics. Zachary Iguelmamene paid Amazon \$1,120.80 via interstate electronic
15 financial transaction for the product. Subsequently, Zachary Iguelmamene engaged REKK to
16 receive a fraudulent refund of the products. The products were delivered to Zachary
17 Iguelmamene's address of record on June 15, 2022, but Zachary Iguelmamene refused delivery.
18 While a refund for the refusal was being processed, Zachary Iguelmamene requested a
19 replacement product. As a result, Amazon was fraudulently induced to refund Zachary
20 Iguelmamene \$1,120.80 via interstate electronic financial transaction on June 17, 2023, and
21 shipped Zachary Iguelmamene a replacement of each product. Zachary Iguelmamene retained
22 the products and the refund. Upon information and belief, Zachary Iguelmamene paid the REKK
23 Operator Defendants a percentage of the fraudulently obtained refund and sent them a vouch,
24 which was posted to the Telegram channel, as evidence of the successful refund.

25 20. **Zoha Ahmed:** On May 2, 2023, Zoha Ahmed placed an Amazon order for a
26 designer watch, causing the product to be shipped via Amazon Logistics. The product was
27 delivered to Zoha Ahmed's address of record on May 4, 2023. Zoha Ahmed paid Amazon

1 933.01 CDN via international electronic financial transaction for the product. Subsequently,
2 Zoha Ahmed engaged REKK to receive a fraudulent refund of the product. On May 7, 2023,
3 Amazon Insider Defendant Janiyah Alford fraudulently approved Zoha Ahmed's refund, despite
4 the product never being returned. As a result, on that day, Amazon was fraudulently induced to
5 refund Zoha Ahmed 937.00 CDN via international electronic financial transaction. Zoha Ahmed
6 retained the product and the refund. Upon information and belief, Zoha Ahmed paid the REKK
7 Operator Defendants a percentage of the fraudulently obtained refund and sent them a vouch,
8 which was posted to the Telegram channel, as evidence of the successful refund.